

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

TEXAS ASSOCIATION FOR MONEY SERVICES BUSINESSES (TAMSB); HIGH VALUE, INC.; REYNOSA CASA DE CAMBIO, INC.; NYDIA REGALADO d/b/a BEST RATE EXCHANGE; MARIO REGALADO d/b/a BORDER INTERNATIONAL SERVICES; LAREDO INSURANCE SERVICES, LLC; E.MEX. FINANCIAL SERVICES, INC.; R & C, INC. d/b/a TEMEX MONEY EXCHANGE; SAN ISIDRO MULTI SERVICES, INC.; CRIS WIN INC. d/b/a BROWNSVILLE CASA DE CAMBIO; ESPRO INVESTMENT LLC d/b/a LONESTAR MONEY EXCHANGE; and ARNOLDO GONZALEZ, Jr.,

Plaintiffs,

v.

PAM BONDI, Attorney General of the United States; SCOTT BESSENT, Secretary of the Treasury; UNITED STATES DEPARTMENT OF THE TREASURY; ANDREA GACKI, Director of the Financial Crimes Enforcement Network; and FINANCIAL CRIMES ENFORCEMENT NETWORK,

Defendants.

Civil Case No. 5:25-cv-00344-FB

**DECLARATION OF MARIO A. REGALADO
OWNER OF BORDER INTERNATIONAL SERVICES**

I, Mario A. Regalado, being of competent mind, declare as follows:

1. I am a United States citizen and a resident of Laredo, Texas. I am 55 years old.
2. I am the owner of Border International Services, a Texas Sole proprietorship, which

is a plaintiff in the above-captioned civil action.

3. I manage Border International Services on a day-to-day basis. I have the authority to speak for Border International Services.

4. Border International Services is registered with the federal Financial Crimes Enforcement Network (“FinCEN”) as a Money Services Business (“MSB”) because it offers currency exchange services.

5. Because it offers those services in 78040, 78041 and 78045, Border International Services is subject to FinCEN’s March 14, 2025, geographic targeting order (the “Border GTO”) requiring MSBs to file Currency Transaction Reports (“CTRs”) for cash transactions over \$200.

6. I estimate that at least 30 % of the transactions that we process are for more than \$200 and would require a CTR under the Border GTO.

7. I know that a CTR is currently required for cash transactions of \$10,000 or more. Before the Border GTO came into effect, Border International Services filed an average of 9 CTR’s per month.

8. The Border GTO is going to radically increase the number of CTRs that we have to file. In a typical month, we do 2,600 cash transactions over \$200 within the covered zip codes.

9. If transaction volume remains the same under the Border GTO, filing all of those additional CTRs would take 870 hrs per month of additional time. Our employees simply do not have time to fill out all that additional paperwork.

10. Under our current procedures, we collect the required customer information for transactions over \$ 1,000 USD but no CTR is filed if the transaction is below \$10,000 USD. However, Border International Services Provides the entire data base to the federal government during the IRS Audits.

11. We value our customers' privacy, and when we collect information from our customers we comply with all applicable privacy laws.

12. We also value the privacy of our business records, and we treat information about transactions at our business as proprietary business information.

13. We currently conduct some transactions over \$200 but below \$1,000 without collecting any information from our customers.

14. The Border GTO forces us to collect information on our customers that we would not otherwise collect and to report information to the federal government that we would not otherwise report.

15. Many customers will not want to provide their sensitive personal information every time they do legal, low-dollar, everyday transactions. And, since the Border GTO does not apply to every zip code, they can take their business to other businesses that are not affected.

16. The Border GTO will either drive away our customers or, if it does not, will impose massive and unsupportable compliance costs. Either way, the impact on our business will be catastrophic.

I declare under penalty of perjury that the foregoing is true and correct.

DATED and SIGNED this 19th day of April, 2025.


Mario A. Regalado